

The Honorable Ralph R. Beistline

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSHUA ALAN WADE,

Defendant.

No. 3:07-cr-0111-RRB-JDR

MOTION TO SHOW CAUSE WHY THIS
COURT SHOULD NOT DISMISS ALL
COUNTS BECAUSE OF THE
ANCHORAGE CORRECTIONAL
COMPLEX'S CONTINUING
VIOLATIONS OF WADE'S RIGHT TO
COUNSEL

MOTION

Comes now the defendant, Joshua Wade, by and through his attorneys, Gilbert H. Levy and Suzanne Lee Elliott, and hereby moves for an Order directing the Anchorage Correctional Complex (ACC) to show cause why this Court should not dismiss all counts against Wade for its continuing violations of Wade's right to counsel. This motion is supported by the accompanying Memorandum in Support.

DATED this day 16th of December, 2009.

MOTION TO SHOW CAUSE RE: DISMISS ALL
COUNTS RE: ACC'S CONTINUING VIOLATIONS
OF RIGHT TO COUNSEL – 1

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/s/Suzanne Lee Elliott

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CERTIFICATE OF SERVICE

I, SUZANNE LEE ELLIOTT, hereby certify that on December 16, 2009, I filed foregoing document with the United States District Court's Electronic Case Filing (CM/ECF) system, which will serve one copy by email on Assistant United States Attorney STEVEN SKROCKI and STEVE COOPER.

/s/Suzanne Lee Elliott

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MOTION TO SHOW CAUSE RE: DISMISS ALL
COUNTS RE: ACC'S CONTINUING VIOLATIONS
OF RIGHT TO COUNSEL – 2

U.S. V. WADE, NO. 3:07-CR-0111-RRB-JDR

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